

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

OSMAN S. IBRAHIM,

Defendant.

No. MJ23-052

COMPLAINT FOR VIOLATION
26 U.S.C. § 5861(d) and 5845(a)(8) and (f)

BEFORE the Honorable Paula L. McCandlis, United States Magistrate Judge,
United States District Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Unlawful Possession of a Destructive Device)

On or about December 28, 2022, in King County, within the Western District of
Washington, OSMAN S. IBRAHIM did knowingly receive and possess a firearm, that is,
destructive device, which was not registered to him in the National Firearms Registration
and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8)
and (f).

1 The undersigned complainant, Michael J. Collier, being duly sworn, further
2 deposes and states as follows:

3 **INTRODUCTION**

4 1. I am a special agent (SA) duly sworn and employed by the U.S.
5 Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF).
6 I am assigned to the ATF Seattle Field Office. I have been an ATF Special Agent since
7 December 13, 2009, responsible for investigating and enforcing violations of federal law.
8 I am also a Certified Explosives Specialist (SACES) and Special Agent Canine Handler
9 (SACH).

10 2. I graduated from the Criminal Investigator Training Program and the ATF
11 Special Agent Basic Training Program, which are both located at the Federal Law
12 Enforcement Training Center in Glynco, Georgia. I completed the ATF Digital Media
13 Collection Specialist Training course and have conducted multiple forensic collections of
14 data from multiple digital media and other electronic storage platforms. I have completed
15 the ATF Certified Explosives Specialist (CES) program, and am responsible for
16 explosive operations, arson investigations, explosive investigations, identifying explosive
17 materials, and mitigating explosives found to be hazardous in nature. I have completed
18 the International Association of Arson Investigators, Fire Investigation Technician
19 Program (FIT) and have been certified as a Fire Investigation Technician. Also, I have
20 planned, supervised, and conducted multiple explosive recoveries and disposals as well
21 as seizure of unlawful or improvised explosive materials. I received my Bachelor of
22 Science degree in Psychology and a second degree in Criminal Justice from Towson
23 University in Towson, Maryland. I obtained a Master of Science degree in Criminal
24 Justice Administration from Columbia Southern University in Orange Beach, Alabama. I
25 also obtained a Master of Science Graduate certificate in Explosives Engineering from
26 Missouri University of Science and Technology in Rolla, Missouri.

27 3. I am responsible for investigations involving specified unlawful activities,
28 to include violent crimes that occur in the Western District of Washington. I am also

1 responsible for enforcing federal arson and explosives laws and related statutes in the
 2 Western District of Washington. I have actively participated in investigations of criminal
 3 activity, including but not limited to: crimes against persons, crimes against property,
 4 narcotics-related crimes, and crimes involving the possession, use, theft, or transfer of
 5 firearms. During these investigations, I have also participated in the execution of search
 6 warrants and the seizure of evidence indicating the commission of criminal violations. As
 7 a law enforcement officer, I have testified under oath, affirmed to applications of search
 8 and arrest warrants, and obtained electronic monitoring orders.

9 4. The facts set forth in this Affidavit are based on my own personal
 10 knowledge; information obtained from other individuals during my participation in this
 11 investigation, including other law enforcement officers; review of documents and records
 12 related to this investigation; communications with others who have personal knowledge
 13 of the events and circumstances described herein; and information gained through my
 14 training and experience. Because this Affidavit is submitted for the limited purpose of
 15 establishing probable cause in support of a criminal complaint, it does not set forth each
 16 and every fact that I, or others, have learned during the course of this investigation.

17 **INVESTIGATION AND PROBABLE CAUSE**

18 **A. Discovery of a Destructive Device on December 29, 2022.**

19 5. On December 29, 2022, at approximately 8:29 a.m., Seattle Police
 20 Department (SPD) personnel responded to a suspicious package call at 918 South Horton
 21 Street, Seattle, the business offices of Urban Self Storage. Seattle Police officers arrived
 22 and contacted Urban Self Storage employees Shawn Leonardo and Jim Kavney. The two
 23 witnesses explained that part of their duties is to walk through the property cleaning and
 24 inspecting periodically. The morning of December 29, 2022, while performing normal
 25 duties, Leonardo observed some trash in a walkway that leads to a small alcove on level
 26
 27
 28

1 A of the garage for the building of 3250 Airport Way South,¹ in the southwest corner of
2 the parking garage. While cleaning up the garbage, Leonardo observed a metal pipe
3 sitting on top of a black piece of clothing. The pipe had two caps on the ends, a green
4 wire coming out of it, and a white tube. Leonardo believed it was a pipe bomb. Leonardo
5 called Kavney to come look at the pipe as well. Kavney and Leonardo came to the same
6 conclusion—that it appeared to be a real pipe bomb—and they vacated the area and
7 called the police.

8 6. SPD officers assisted the employees as they searched through security
9 video recordings of the garage alcove and hallway trying to determine how the device got
10 to that location. They located video from December 26, 2022, starting at about 8:30 p.m.
11 that depicted a male individual in that hallway. The video is of high quality. The
12 employees immediately recognized the male in the video from previous encounters and
13 incidents involving him in their building. They had nicknamed him “Hatchet” due to him
14 usually carrying a hatchet with him. One employee had a record of Hatchet’s real name
15 because she had obtained a protection order against him. She reported his name was
16 Osman Ebrahm AKA Ibrahim. He was subsequently identified as suspect OSMAN S.
17 IBRAHIM, as discussed below.

18 7. The December 26, 2022, video depicts OSMAN S. IBRAHIM in the alcove
19 covering up the security camera with a jacket. OSMAN S. IBRAHIM’s face was pointed
20 directly at the camera when he did so, and his features were depicted clearly. The video
21 next depicted OSMAN S. IBRAHIM removing the jacket from the camera at 9:36 p.m.,
22 about 36 minutes after he had covered it. Behind OSMAN S. IBRAHIM, in a corner of
23 the alcove, a black clothing item could then be seen laying on the ground in the corner
24 where it had not been before.

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26
27
28 ¹ This building houses Urban Work Lofts, which is owned and managed by Urban Self Storage. The two businesses share the parking garage.

1 8. The officers and employees then located additional motion-activated
2 security videos from December 28, 2022. There were no other motion activation videos
3 located between these two dates.

4 9. The video from December 28, 2022, at about 2:01 a.m., depicts OSMAN S.
5 IBRAHIM again approaching and covering the camera up with a jacket. The black
6 clothing item could still be seen in the same corner behind OSMAN S. IBRAHIM where
7 it has been left on December 26, 2022. About an hour later, at 3:01 a.m., OSMAN S.
8 IBRAHIM uncovered the camera. When he approached the camera to cover it and again
9 when he removed the jacket, OSMAN S. IBRAHIM's features were clearly visible. Once
10 he removed the jacket from the camera, the metal pipe device recovered on December 29,
11 2022, was clearly visible on top of the black clothing item previously placed there on
12 December 26, 2022, and which was still in the same corner. The video then showed
13 OSMAN S. IBRAHIM walking slowly out of the alcove, past the metal pipe device, and
14 down a walkway, taking a wagon-style cart with him.

15 10. Officer Moreno, who had responded to the call and watched the
16 surveillance video, recognized OSMAN S. IBRAHIM from previous contacts. That
17 officer obtained a photograph of OSMAN S. IBRAHIM from the King County Jail and
18 confirmed that identification.

19 11. Also on December 28, 2022, the SPD Arson Bomb Squad (ABS) arrived on
20 scene to evaluate the suspected device. Based upon the visual inspection of the
21 photograph of the device, members of the bomb squad had reason to believe based upon
22 training and experience that the device was a real device. An X-ray image was taken of
23 the pipe, and that image was enhanced and interpreted. The X-ray gave further
24 confirmation to the bomb squad that the filler material inside the pipe was suspected
25 explosives. The device was loaded into a fragmentation container and transported to the
26 bomb squad's demolition range for further procedures to render the pipe bomb safe.

27 12. After the device was rendered safe, the filler content was collected,
28 processed, and documented for evidence with the following results.

- 1 • The pipe measured 9” from end cap to end cap, with a 1.3” exterior
- 2 diameter.
- 3 • The total length of the fuse was 14.37” with 3.54” of that fuse being inside
- 4 the pipe.
- 5 ○ A small piece of the fuse was cut, and field tested with positive
- 6 results for energetic materials by rapidly burning.
- 7 • The filler material of the pipe was measured at approximately 97 grams of
- 8 suspected pyrotechnic powder.
- 9 ○ A small amount of the filler material was collected and field tested.
- 10 When ignited, the filler material reacted in a manner consistent with
- 11 explosive powders by burning, sparking, and flashing.

12 **B. Arrest of OSMAN S. IBRAHIM.**

13 13. At approximately 10:30 a.m. on December 29, 2022, while the bomb squad

14 was still at the scene working to make the device safe, SPD K9 Officer Nelson observed

15 suspect OSMAN S. IBRAHIM pass by the scene on a bicycle heading south on Airport

16 Way South; he was looking intently at the scene. Officer Nelson believed he matched the

17 description of the person who placed the pipe bomb. At about the same time, Leonardo

18 pointed at OSMAN S. IBRAHIM and said something to the effect of, “That’s the guy!”

19 Officers Nelson and Moreno went south where they located the suspect near South

20 Spokane Street. Officer Moreno confirmed his identification as OSMAN S. IBRAHIM

21 and detained him.

22 14. Shortly thereafter, SPD Detective Heuchert and I conducted a recorded

23 interview of OSMAN S. IBRAHIM. Detective Heuchert read OSMAN S. IBRAHIM his

24 *Miranda* warnings, which OSMAN S. IBRAHIM acknowledged understanding. OSMAN

25 S. IBRAHIM then spoke with the investigators. He said he picks cans out of the trash to

26 make money. He said he takes what he wants or needs and gets rid of stuff he doesn’t

27 want by throwing it in the trash or leaving it there. He said he didn’t know about a bomb,

28

1 didn't know what a pipe bomb is, and he had no intention to hurt anyone. He denied
2 spending much time in the parking garage, but acknowledged going through garbage
3 there. He also said, "I don't have no use for it." OSMAN S. IBRAHIM also claimed that
4 he was a good person who helped the community by cleaning it up.

5 **C. Preliminary Destructive Device Determination and Records Check.**

6 15. On January 5, 2023, I contacted ATF's Destructive Device Determination
7 Unit to review the photographic and video evidence regarding the incident. The
8 Destructive Device Determination Unit provided the following statement:

9 Based upon the photographs and video provided it appears that the filler of the
10 device is indeed energetic material, and the pyrotechnic fuse is functional.

11 Additionally, the construction of the device leaves little ambiguity and leads me to
12 believe that pending final laboratory analysis and examination by an Explosives
13 Enforcement Branch Examiner or EEO the item with [sic] most likely be deemed
14 as a destructive device as that term is defined in 26 U.S.C. 5845(f) and 18 U.S.C.
15 921(a)(4). Again, this is a preliminary analysis pending final evaluation and
16 issuance of formal reports.

17 16. On January 4, 2023, I contacted the National Firearms Registration and
18 Transfer Record. I received notification that there is no record of any items being
19 registered to OSMAN S. IBRAHIM.

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CONCLUSION

17. Based on the foregoing, I respectfully submit that there is probable cause to believe that OSMAN S. IBRAHIM committed the offense of *Unlawful Possession of a Destructive Device*, in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8) and (f).

MICHAEL
COLLIER

Digitally signed by MICHAEL
COLLIER
Date: 2023.02.01 10:53:17
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MICHAEL J. COLLIER
Special Agent, ATF

Based on the Complaint and Affidavit, to which the above-named agent provided a sworn statement attesting to the truth of the contents of such, the Court hereby finds that there is probable cause to believe the defendant, OSMAN S. IBRAHIM, committed the offense set forth in the Complaint.

DATED this 3rd day of February, 2023.



PAULA L. MCCANDLIS
United States Magistrate Judge